

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**AC, a minor, by and through RC,  
As parent and next friend,**

**Plaintiff,**

**v.**

**Case No.: 3:22-cv-00336**

**HENRICO COUNTY SCHOOL BOARD,**

**Defendant.**

**JOINT MOTION FOR APPROVAL OF SETTLEMENT**

COME NOW the Plaintiff, AC, a minor, by and through RC, as parent and next friend, by counsel, and the Defendant, Henrico County School Board, by counsel, and request that this Honorable Court approve a proposed settlement of the disputed issues in this legal action reached by the parties. They state the following in support of this joint motion.

1. The Court referred the parties to a settlement conference with Magistrate Judge Mark R. Colombell on September 18, 2023.
2. This settlement conference occurred on October 27, 2023 at which time the parties agreed on a proposed resolution of the disputed issues in this legal action.
3. Subsequent to October 27, 2023, the parties drafted a Settlement Agreement and Release that resolves the dispute between the parties and whose terms, if approved by the Court, would bring an end to this litigation. The parties are in the process of executing this Agreement.
4. The parties have agreed that the terms of their proposed agreement should remain confidential to the greatest extent possible. For this reason, given the Court's desire to approve this proposed settlement, the parties ask that the Court review the Settlement

Agreement and Release *in camera* and that the parties be excused from filing their agreement with the Clerk or discussing its terms in detail in open court.

WHEREFORE, based on the above-stated facts, both the Plaintiff and the Defendant jointly request that this Honorable Court approve the terms of their proposed settlement after its review of those terms *in camera*.

**RESPECTFULLY SUBMITTED,**

/s/

John D. McChesney (VSB No. 44326)  
Senior Assistant County Attorney  
Office of the County Attorney  
County of Henrico  
P. O. Box 90775  
Henrico, Virginia 23273-0775  
*Counsel for Defendant*

/s/

W. Peyton Akers (VSB No. 89933)  
Akers & Cleator Law Group, P.L.L.C.  
3917 Midlands Road  
Building 2 – Suite 100  
Williamsburg, VA 23188  
*Counsel for Plaintiff*